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8 Attorneys for Plaintiff
 9 UNITED STATES OF AMERICA

10
 11 UNITED STATES DISTRICT COURT
 12 CENTRAL DISTRICT OF CALIFORNIA
 13 SOUTHERN DIVISION
 14

15 UNITED STATES OF AMERICA,)	Case No. SA CR 10-0028-JVS
)	
16 Plaintiff,)	PLEA AGREEMENT
)	
17 v.)	[18 U.S.C. § 1424]
)	[18 U.S.C. § 1425]
)	[18 U.S.C. § 1524]
19 CONCETTA VASQUEZ,)	[42 U.S.C. § 408(a)(6)]
aka "Jane Doe,")	
20 aka Michelle Llacuna,)	
aka Michelle L. Anunciacion,)	
21 Defendant.)	
22)	

23
 24 1. This constitutes the plea agreement between defendant
 25 CONCETTA VASQUEZ ("defendant"), who has previously been
 26 identified in this case as "Jane Doe" and who has used the names
 27 "Michelle Augustine Llacuna" and "Michelle L. Anunciacion," and
 28 the United States Attorney's Office for the Central District of

1 California ("the USAO") in the above-captioned case. This
2 Agreement is limited to the USAO and cannot bind any other
3 federal, state, or local prosecuting, administrative, or
4 regulatory authorities.

5 **GUILTY PLEAS**

6 2. Defendant agrees to plead guilty to all four counts of
7 the four-count indictment on file in the above-captioned case,
8 United States v. Jane Doe, a/k/a "Michelle L. Anunciacion," Case
9 No. SA CR 10-0028-JVS. Defendant admits that she is, in fact,
10 guilty of the offenses as described in counts one through four of
11 the indictment.

12 **NATURE OF THE OFFENSES**

13 3. In order for defendant to be guilty of count one of the
14 indictment, which charges a violation of 18 U.S.C. § 1424, the
15 following must be true: (1) defendant was an applicant in a
16 naturalization or citizenship proceeding; and (2) defendant, as
17 such applicant, knowingly personated another or appeared falsely
18 in an assumed or fictitious name.

19 4. In order for defendant to be guilty of count two of the
20 indictment, which charges a violation of 18 U.S.C. § 1425, the
21 following must be true: (1) defendant procured naturalization;
22 (2) defendant procured naturalization knowingly; (3) defendant
23 was not entitled to naturalization; and (4) defendant knew that
24 she was not entitled to naturalization, or knew that she was
25 making misrepresentations on her naturalization petition or in
26 her naturalization interview or both.

27 5. In order for defendant to be guilty of count three of
28 the indictment, which charges a violation of 18 U.S.C. § 1542,

1 the following must be true: (1) defendant willfully and knowingly
2 made a false statement in an application for a United States
3 passport; and (2) defendant did so with the intent to induce and
4 or secure issuance of a passport for her own use or the use of
5 another.

6 6. In order for defendant to be guilty of count four of
7 the indictment, which charges a violation of 42 U.S.C.
8 § 408(a)(6), the following must be true: (1) defendant willfully
9 and knowingly furnished false information to the Social Security
10 Administration ("SSA"); and (2) defendant did so with the intent
11 to deceive the SSA as to her true identity.

12 PENALTIES

13 7. The statutory maximum sentence that the Court can
14 impose for a violation of 18 U.S.C. § 1424 is as follows: 5 years
15 imprisonment; a fine of \$250,000; a 3-year period of supervised
16 release; and a mandatory special assessment of \$100. The
17 statutory maximum sentence that the Court can impose for a
18 violation of 18 U.S.C. § 1425 is as follows: 10 years
19 imprisonment; a fine of \$250,000; a 3-year period of supervised
20 release; and a mandatory special assessment of \$100. The
21 statutory maximum sentence that the Court can impose for a
22 violation of 18 U.S.C. § 1542 is as follows: 10 years
23 imprisonment; a fine of \$250,000; a 3-year period of supervised
24 release; and a mandatory special assessment of \$100. The
25 statutory maximum sentence that the Court can impose for a
26 violation of 42 U.S.C. § 408(a)(6) is as follows: 5 years
27 imprisonment; a fine of \$250,000; a 3-year period of supervised
28 release; and a mandatory special assessment of \$100. Therefore,

1 the total maximum sentence for the offenses to which defendant is
2 pleading guilty is as follows: 30 years imprisonment; a fine of
3 \$1,000,000; a 3-year period of supervised release; and a
4 mandatory special assessment of \$400.

5 8. Supervised release is a period of time following
6 imprisonment during which defendant will be subject to various
7 restrictions and requirements. If defendant violates one or more
8 of the conditions of any supervised release imposed, he may be
9 returned to prison for all or part of the term of supervised
10 release, which could result in defendant serving a total term of
11 imprisonment greater than the statutory maximum stated above.

12 9. If defendant is presently on probation, parole, or
13 supervised release in another case, a conviction in this case may
14 cause the court or parole authorities responsible for any such
15 other case to revoke defendant's probation, parole, or supervised
16 release.

17 10. A conviction in this case may have collateral
18 consequences that the Court has no power to control, and
19 unanticipated collateral consequences will not serve as grounds
20 for a defendant to later withdraw a guilty plea. A conviction in
21 this case may cause defendant to lose certain civic rights or
22 benefits, such as the right to vote, the right to possess a
23 firearm, the right to hold office, the right to serve on a jury,
24 and the revocation of a professional license. Moreover, because
25 defendant's guilty pleas will admit that she obtained
26 naturalization as a U.S. Citizen through fraud and under false
27 pretenses, a conviction in this case will cause defendant to be
28 denaturalized (i.e., have her status as a U.S. Citizen revoked)

1 and may subject defendant to deportation or removal from the
2 United States (which may be mandatory, in some cases) or
3 otherwise affect defendant's immigration status.

4 **FACTUAL BASIS**

5 11. Defendant and the USAO agree and stipulate to the
6 following statement of facts, which defendant concedes could be
7 proved to a jury beyond a reasonable doubt at trial:

8 (a) On February 23, 2000, defendant was an
9 applicant in a naturalization and citizenship
10 proceeding. As such, she knowingly personated another
11 and appeared falsely in an assumed and fictitious name,
12 specifically, the name of "Michelle Augustin Llacuna,"
13 in connection with a naturalization ceremony and other
14 proceedings on defendant's application to become a
15 naturalized United States citizen.

16 (b) On February 23, 2000, defendant knowingly
17 procured for herself, contrary to law, naturalization
18 as a United States citizen and documentary and other
19 evidence of such naturalization, to which she was not
20 entitled. Specifically, defendant knowingly procured
21 naturalization for herself, contrary to law, by making
22 material false statements in connection with her
23 application for naturalization, including statements
24 (a) that her name was "Michelle Augustin Llacuna";
25 (b) that certain information accurately specified the
26 names of her parents, her date of birth, and her place
27 of birth; and (c) that defendant had never given false
28 testimony for the purpose of obtaining an immigration

1 benefit. In truth, as defendant well knew,
2 (a) "Michelle Augustin Llacuna" was not her true name;
3 (b) the information regarding the names of defendant's
4 parents, defendant's date of birth, and defendant's
5 place of birth were all untrue; and (c) defendant had
6 given false testimony to obtain an immigration benefit
7 to which she was not entitled, including false sworn
8 statements regarding her name and other identifying
9 information in support of her application for an
10 immigrant visa and alien registration (by which she
11 fraudulently obtained admission into the United States
12 and issuance of a permanent resident alien card), and
13 her application for naturalization and related
14 proceedings. Defendant also procured her
15 naturalization as a United States citizen contrary to
16 law, and to which she was not entitled, because she had
17 obtained her permanent residency status by fraud.

18 (c) On January 5, 2001, defendant willfully and
19 knowingly made a false statement in an application for
20 a United States passport. She did so with the intent
21 to induce and secure for her own use the issuance of a
22 passport under the authority of the United States,
23 contrary to the laws regulating the issuance of such
24 passports and the rules prescribed pursuant to such
25 laws, in that, in such application, defendant stated
26 that her name was "Michelle Augustin Llacuna" and
27 provided other information regarding the names of her
28 parents, her date of birth, and her place of birth. In

1 truth and fact, as defendant knew, her name was not
2 "Michelle Augustin Llacuna" and her other identifying
3 information was also false.

4 (d) On July 20, 2007, defendant, with intent to
5 deceive the Commissioner of Social Security as to her
6 true identity, knowingly and willfully furnished and
7 caused to be furnished false information to the
8 Commissioner of Social Security with respect to
9 information required by the Commissioner of Social
10 Security in connection with the establishment and
11 maintenance of the records provided for in Title 42,
12 United States Code, Section 405(c)(2), in that, in an
13 application for a replacement Social Security Card,
14 defendant knowingly and willfully made false statements
15 as to her name, the names of her parents, her date of
16 birth, and her place of birth.

17 (e) After her naturalization, defendant did not
18 make a false claim to U.S. citizenship, although it was
19 procured by a false statement.

20 **WAIVER OF CONSTITUTIONAL RIGHTS**

21 12. Defendant understands that, if she pleads guilty,
22 there will be no trial. By pleading guilty, defendant
23 understands that she is giving up all of the following rights,
24 which she agrees to waive at the change of plea hearing:

- 25 (a) The right to persist in a plea of not guilty;
26 (b) The right to a speedy and public trial by jury;
27 (c) The right to the assistance of counsel at
28 trial, including, if defendant could not afford an

1 attorney, the right to have the Court appoint one for
2 defendant;

3 (d) The right to be presumed innocent and to have
4 the burden of proof placed on the Government to prove
5 defendant guilty beyond a reasonable doubt;

6 (e) The right to confront and cross-examine
7 witnesses against defendant;

8 (f) The right, if defendant wished, to testify on
9 her own behalf and present evidence in opposition to
10 the charges, including the right to call witnesses and
11 to subpoena those witnesses to testify; and

12 (g) The right not to be compelled to testify,
13 and, if defendant chose not to testify or present
14 evidence, to have that choice not be used against
15 defendant.

16 13. By pleading guilty, defendant also gives up any and
17 all rights to pursue any affirmative defenses, Fourth Amendment
18 or Fifth Amendment claims, and other pretrial motions that have
19 been filed or could be filed (e.g., motions to suppress evidence
20 or dismiss the indictment on any ground).

21 **SENTENCING FACTORS**

22 14. In determining defendant's sentence, the Court is
23 required to consider the factors set forth in 18 U.S.C.
24 § 3553(a)(1)-(7), including the sentencing range established
25 under the United States Sentencing Guidelines. Defendant
26 understands that the Sentencing Guidelines are only advisory and
27 not binding on the Court under United States v. Booker, 543 U.S.
28 220 (2005). Defendant thus understands that, after "considering"

the Sentencing Guidelines and the other § 3553(a) factors, the Court is free to exercise its discretion to impose any sentence up to the maximum set by statute for the crimes of conviction.

15. Defendant understands the following: As used in this Agreement, the terms "depart," "departure," "adjust," "adjustment," and "specific offense characteristics" shall have the same meaning as in the Sentencing Guidelines. The terms "vary" and "variance" mean any decision by the Court under Booker, on whatever grounds, to impose a sentence that is above or below the determined Guidelines' sentencing range. "Total Adjusted Offense Level" means the offense level calculated by the Court based on consideration of all special offense characteristics and Chapter 3 or 4 adjustments, but before considering whether to grant any departure or variance.

16. Defendant and the USAO agree and stipulate to the following applicable sentencing guideline factors, based on the November 1, 2005 Guideline Manual:

COUNT ONE: False Personation in Naturalization Proceeding

Base Offense Level 8 U.S.S.G. § 2L2.2(a)

Specific Offense Characteristics

Defendant fraudulently obtained a United States passport: +4 U.S.S.G. § 2L2.2(b)(3)(A)

SUB-TOTAL: 12

COUNT TWO: Unlawful Procurement of Naturalization**Base Offense Level** 8 U.S.S.G. § 2L2.2(a)**Specific Offense
Characteristics**

Defendant fraudulently
obtained a United States
passport: +4 U.S.S.G. § 2L2.2(b)(3)(A)

SUB-TOTAL: 12

COUNT THREE: False Statement in Passport Application**Base Offense Level** 8 U.S.S.G. § 2L2.2(a)**Specific Offense
Characteristics**

Defendant fraudulently
obtained a United States
passport: +4 U.S.S.G. § 2L2.2(b)(3)(A)

SUB-TOTAL: 12

COUNT FOUR: Furnishing False Information to Social Security**Base Offense Level** 8 U.S.S.G. § 2L2.2(a)**Specific Offense
Characteristics**

Defendant fraudulently
obtained a United States
passport: +4 U.S.S.G. § 2L2.2(b)(3)(A)

SUB-TOTAL: 12

CHAPTER 3 ADJUSTMENTS

Highest Count-Specific
Sub-Total (from above): 12

Grouping of counts--
No additional increase: 0 U.S.S.G. § 3D1.2(b)

Acceptance of
Responsibility: -2 U.S.S.G. § 3E1.1

**TOTAL ADJUSTED
OFFENSE LEVEL:** **10**

1 Defendant and the USAO agree to not argue for application of any
2 other specific offense characteristic or adjustment. Defendant
3 reserves the right to argue for a downward departure under the
4 Guidelines, and she reserves the right under Booker to argue for
5 a downward "variance," that is, any sentence that she believes to
6 be fair and reasonable. The USAO reserves the right to make all
7 arguments in opposition to a defense motion for, or USPO
8 recommendation of, a downward departure or variance. The USAO
9 agrees to make no motion for an upward departure or upward
10 variance.

11 17. There is no agreement as to defendant's criminal
12 history or criminal history category.

13 18. The stipulations in this Agreement do not bind either
14 the United States Probation Office or the Court. The Court will
15 determine the facts and calculations relevant to sentencing.
16 Both defendant and the USAO are free to: (a) supplement the facts
17 stipulated to in this Agreement by supplying relevant information
18 to the United States Probation Office and the Court, (b) correct
19 any and all factual misstatements relating to the calculation of
20 the sentence, and (c) argue on appeal and collateral review that
21 the Court's sentencing calculations are not error; provided,
22 however, that each party agrees to maintain its view that each
23 and every fact set forth in Paragraph 11's statement of Factual
24 Basis are true and correct and that the Sentencing Guideline
25 stipulations in Paragraph 16 are consistent with the facts of
26 this case.

DEFENDANT'S OBLIGATIONS

19. Pursuant to this Agreement, defendant agrees to do all of the following things:

(a) To plead guilty as set forth in this Agreement and not thereafter move to withdraw her guilty pleas.

(b) To waive, without reservation, all of the rights referenced in Paragraphs 12 and 13 of this Agreement.

(c) To not knowingly and willfully fail to abide by all sentencing stipulations contained in this Agreement.

(d) To not knowingly and willfully fail to
(i) appear as ordered for all court appearances,
(ii) surrender as ordered for service of sentence,
(iii) obey all conditions of any bond, and (iv) obey any other ongoing court order in this matter.

(e) Not to commit any crime; however, offenses which would be excluded for sentencing purposes under U.S.S.G. § 4A1.2(c)(2) (e.g., traffic infractions) are not within the scope of this Agreement.

(f) To not knowingly and willfully fail to be truthful at all times with Pretrial Services, the U.S. Probation Office, and the Court.

(g) To pay the applicable special assessments at or before the time of sentencing, unless defendant lacks the ability to pay.

(h) Pursuant to 8 U.S.C. § 1451(a), defendant stipulates to the entry of an order revoking her citizenship and cancelling the Certificate of Naturalization, Number 25515737, because she illegally procured her United States citizenship in the manner detailed in the indictment and Paragraph 11 of this Agreement. The Proposed Order Revoking Citizenship is attached hereto as Exhibit A. Upon entry of the Order Revoking Citizenship, defendant agrees to immediately surrender her Certificate of Naturalization, Number 25515737, any copies thereof in her possession, along with any other indicia of United States citizenship in defendant's name or any other alias name (e.g., U.S. Passport) to the Attorney General of the Department of Justice, or one of his representatives. Defendant understands that upon entry of the Order Revoking Citizenship, she will not be legally able to claim any rights, privileges, or advantages from her revoked United States citizenship obtained as a result of her February 23, 2000 naturalization and that doing so will subject her to possible criminal and civil penalties. Defendant agrees that neither she nor her heirs or assigns will challenge her denaturalization by any means, including but not limited to, any appeal (whether administrative or judicial), any collateral attack, or any application for injunctive action, or equitable relief. Defendant understands and agrees that upon entry of an order revoking her United States

1 citizenship, she will revert to her former status as a
2 Lawful Permanent Resident and she may be subject to the
3 institution of removal proceedings, as a deportable
4 alien, under section 237 of the Immigration and
5 Nationality Act ("INA"), 8 U.S.C. § 1227, or any future
6 INA provision defining classes of deportable aliens,
7 based on defendant's convictions in this case.

8 **USAO'S OBLIGATIONS**

9 20. If defendant complies fully with all of her
10 obligations under this Agreement, the USAO agrees to do the
11 following:

12 (a) To abide by all sentencing stipulations
13 contained in this Agreement.

14 (b) At the time of sentencing, provided that
15 defendant demonstrates an acceptance of responsibility
16 for the offense up to and including the time of
17 sentencing, to recommend a two-level reduction in the
18 applicable sentencing guideline offense level, pursuant
19 to U.S.S.G. § 3E1.1, and an additional one-level
20 reduction if available under that section.

21 (c) As to the term of confinement, to recommend
22 that defendant be sentenced at the low-end of the
23 applicable Guidelines range provided that the Total
24 Adjusted Offense Level as calculated by the Court is
25 10 and provided that the Court does not depart
26 downward from the Total Adjusted Offense Level or
27 Criminal History Category. The government reserves the
28 right to argue that any term of confinement be

1 satisfied by imprisonment, not home detention or in a
2 community confinement center. If, for any reason, the
3 Court determines defendant's Total Adjusted Offense
4 Level is higher than 10, the USAO agrees to argue for a
5 downward Booker variance for a term of imprisonment
6 that is at the low-end of the sentencing range
7 applicable to Level 10.

8 **BREACH OF AGREEMENT**

9 21. If, at any time between the execution of this
10 Agreement and her sentencing, defendant knowingly violates or
11 fails to perform any of her obligations under this Agreement ("a
12 breach"), the USAO may declare defendant to be in breach of this
13 Agreement. If the USAO declares this Agreement breached, and the
14 Court finds such a breach to have occurred, defendant will not be
15 able to withdraw her guilty pleas, but the USAO will be relieved
16 of all of its obligations under this Agreement.

17 **WAIVERS OF APPEAL AND COLLATERAL ATTACK**

18 22. Defendant waives and gives up the right to appeal her
19 conviction on all counts to which she pleads guilty. Defendant
20 also waives and gives up the right to appeal any term of
21 imprisonment imposed by the Court, and the manner in which the
22 sentence is determined, provided that the following conditions
23 are satisfied: (a) the prison term is within the statutory
24 maximum specified above; (b) the Court determines that the Total
25 Adjusted Offense Level is 10 or below; (c) the Court does not
26 depart upward from the Total Adjusted Offense Level or Criminal
27 History Category; and (d) the Court imposes a sentence within or
28 below the Guidelines sentencing range that corresponds to the

1 determined Total Adjusted Offense Level and Criminal History
2 Category. Defendant also waives and gives up the right to appeal
3 (a) any standard condition of supervised release set forth in the
4 Court's General Orders 318 and 01-05; (b) the drug/alcohol use
5 and testing conditions mandated by 18 U.S.C. §§ 3563(a)(5),(b)(7)
6 and 3583(d); and (c) any special condition to which defendant
7 does not object at or before sentencing.

8 23. Defendant waives and gives up any right to bring a
9 post-conviction collateral attack on her conviction and sentence,
10 except a post-conviction collateral attack based on a claim of
11 ineffective assistance of counsel, a claim of newly discovered
12 evidence, or a retroactive change in the applicable Sentencing
13 Guidelines, sentencing statutes, or statutes of conviction.

14 24. The USAO gives up its right to appeal the sentence,
15 provided the following conditions are satisfied: (a) the Court
16 determines that the Total Adjusted Offense Level is 10 or
17 above; (b) the Court, in determining the applicable guideline
18 range, does not depart downward from the Total Adjusted Offense
19 Level or criminal history category; and (c) the Court imposes a
20 sentence within or above the range corresponding to the
21 determined Total Adjusted Offense Level and Criminal History
22 Category.

23 **COURT NOT A PARTY TO AGREEMENT**

24 25. The Court is not a party to this Agreement and need
25 not accept any of its stipulations or the USAO's sentencing
26 recommendations. Even if the Court ignores any sentencing
27 recommendation, finds facts or reaches conclusions different from
28 any stipulation, and/or imposes any sentence up to the maximum

1 established by statute, defendant cannot, for that reason,
2 withdraw her guilty pleas, and defendant will remain bound to
3 fulfill all of her obligations under this Agreement. No one --
4 not the prosecutor, defendant's attorney, or the Court -- can
5 make a binding prediction or promise regarding the sentence
6 defendant will receive, except that it will be within the
7 statutory maximum.

8 SCOPE OF AGREEMENT

9 26. This Agreement applies only to those crimes charged in
10 the pending indictment and the disposition thereof, as well as
11 the denaturalization of defendant's status as a U.S. citizen.
12 This Agreement has no effect on any other crimes not charged in
13 the pending indictment. This Agreement shall not preclude or
14 have any other effect on any motions or orders in this case that
15 are collateral to defendant's change of plea or sentencing or on
16 any other separate proceedings against defendant not mentioned
17 expressly herein, including any past, present, or future
18 forfeiture actions.

19 NO OTHER AGREEMENTS

20 27. This Agreement sets forth the entire agreement between
21 defendant and the USAO. Except as set forth herein, there are no
22 promises, understandings, or agreements, written or oral, express
23 or implied, between the USAO and defendant or defendant's
24 counsel. Nor may any additional agreement, understanding, or
25 condition, including any modification of this Agreement, be
26 entered into except by (1) a writing signed by all parties or
27 (2) by an oral modification that is expressly identified on the
28

1 record as an intended modification of this Agreement and that is
2 subscribed to expressly by all parties on the record in court.

3 AGREEMENT PART OF GUILTY PLEA HEARING

4 28. This Agreement shall be considered part of the record
5 of defendant's guilty plea hearing as if the entire Agreement had
6 been read into the record of the proceeding.

7 EFFECTIVE DATE

8 29. This Agreement is effective upon signature by
9 defendant, her counsel, and an Assistant United States Attorney.

10 AGREED AND ACCEPTED:

11 UNITED STATES ATTORNEY'S OFFICE
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 ANDRÉ BIROTTE JR.
14 United States Attorney

15 
16 ROBERT J. KEENAN
Assistant United States Attorney

August 12, 2010.
Date

17
18 AGREED AND ACCEPTED BY DEFENDANT:

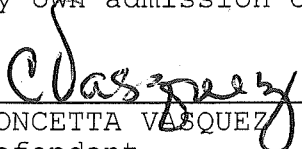
19 I have read this Agreement in its entirety, and I have
20 thoroughly discussed every part of it with my attorney. I have
21 had enough time to review and consider the Agreement. I
22 understand the terms of this Agreement, and I freely and
23 voluntarily agree to those terms.

24 I have had a satisfactory opportunity to talk with my
25 attorney about the evidence against me. My attorney has advised
26 me of my rights, of possible defenses, of the Sentencing
27 Guideline provisions, and of the consequences of entering into
28

1 this Agreement. I am satisfied with my attorney's representation
2 of me in this matter.

3 No promises, inducements, or representations of any kind
4 have been made to me by anyone (including the prosecutor, agents,
5 or my attorney) other than those contained in this Agreement. In
6 particular and without limitation, no one has told me that I will
7 receive any particular sentence or a sentence within any
8 particular range, except that my sentence will not exceed the
9 statutory maximum permitted by law. No one has threatened me or
10 used force against me, or persons close to me, in any way to get
11 me to enter into this Agreement. I am agreeing to plead guilty
12 because I am guilty as charged, not for any other reason.

13 I understand the consequences of pleading guilty. Among
14 other things, I understand that, if I plead guilty in Court in
15 accordance with this Agreement, there will be no trial, the
16 government will be relieved of its burden of proving me guilty,
17 and there will be nothing left for the Court to do but sentence
18 me. There will be no trial because I will be convicted based on
19 my own admission of guilt.

20 
21 CONCETTA VASQUEZ
22 Defendant

20 8/10/10
21 Date

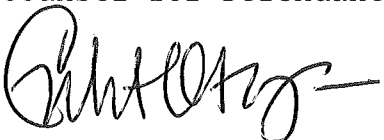
23
24 **DEFENSE COUNSEL'S CERTIFICATION:**

25 I am the attorney for CONCETTA VASQUEZ, the defendant in
26 this case, who has thus far been referred to in this case as JANE
27 DOE a/k/a "Michelle Llacuna" and "Michelle L. Anunciacion." I
28 have carefully discussed every part of this Agreement with my

1 client. I have fully advised my client of her rights, of
2 possible defenses, of the Sentencing Guidelines' provisions, and
3 of the consequences of entering into this Agreement. To my
4 knowledge, my client's decision to enter into this Agreement is
5 an informed and voluntary one. I have made no promises or
6 representations to my client that she will receive any particular
7 sentence or a sentence within any particular range, except that
8 the sentence will not exceed the statutory maximum sentence
9 permitted by law, nor any promises contrary to the advisements
10 contained in this Agreement.

11 
12 AMY M. KARLIN
13 Counsel for Defendant

8/10/10
Date

14 
15 Cuauhtemoc Ortega
16 Counsel for defendant
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8/10/10

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Attorneys for Plaintiff
 UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 SOUTHERN DIVISION

UNITED STATES OF AMERICA,)	Case No. SA CR 10-0028-JVS
)	
Plaintiff,)	[PROPOSED] ORDER REVOKING
)	CITIZENSHIP
)	
v.)	
)	
)	
CONCETTA VASQUEZ,)	
aka Michelle Llacuna,)	
aka Michelle L. Anunciacion,)	
)	
Defendant.)	

Defendant CONCETTA VASQUEZ, previously referred to in the above-captioned case as "JANE DOE," and who has used the names "Michelle Augustine Llacuna" and "Michelle Llacuna Anunciacion," having admitted to procuring her naturalization as a U.S. Citizen under a false personation and through related false statements in violation of 18 U.S.C. §§ 1424 and 1425, including in her

1 Application for Naturalization and Sworn Statement related to the
 2 Oath Ceremony, and consenting to an order revoking citizenship in
 3 her name:

4 IT IS HEREBY ORDERED THAT the naturalization of defendant
 5 ordered by the Attorney General of the United States admitting
 6 defendant to United States citizenship on February 23, 2000 is
 7 revoked and set aside, and the Certificate of Naturalization
 8 No. 25515737 is cancelled.

9 IT IS FURTHER ORDERED THAT defendant, from the date of this
 10 Order, is forever restrained and enjoined from claiming any
 11 rights, privileges, or advantages under any document that
 12 evidences United States citizenship in ~~her true name, CONCEP~~ ^{AK CV}
 13 ~~VASQUEZ, or~~ the false name and personation that she used to
 14 obtain U.S. citizenship, "Michelle Augustine Llacuna," or the
 15 derivative married name that she has used most recently,
 16 "Michelle Llacuna Anunciacion."

17 IT IS FURTHER ORDERED THAT defendant surrender and deliver
 18 the Certificate of Naturalization, No. 25515737, and any copies
 19 thereof in her possession (and to make good faith efforts to
 20 recover and then surrender any copies thereof that she knows are
 21 in possession of others) to the Attorney General or authorized
 22 representatives of the U.S. Department of Justice immediately;
 23 and return any other indicia of United States citizenship and any
 24 copies thereof in her possession (and to make good faith efforts
 25 to recover and then surrender any copies thereof that she knows
 26 are in possession of others), including, but not limited to, any

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1 United States passport, voter registration card, and other voting
2 documents issued to defendant.

3 IT IS SO ORDERED.

4 Dated: August __, 2010.

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6 JAMES V. SELNA
UNITED STATES DISTRICT JUDGE

7
8 Respectfully submitted:

9 ANDRÉ BIROTTE JR.
United States Attorney

10 DENNISE D. WILLETT
11 Assistant United States Attorney
Chief, Santa Ana Section
12

13 /s/ R.J.K.
ROBERT J. KEENAN
14 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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